Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In the Matter of		
Wireless E911 Location Accuracy Requirements)	PS Docket No. 07-114

To: Chief, Public Safety & Homeland Security Bureau

E911 EXCLUSION REPORT FOR ATN INTERNATIONAL, INC.

ATN International, Inc., on behalf of its direct and indirect Commercial Mobile Radio Service ("CMRS") subsidiaries (collectively, "ATN"), hereby submits its E911 Exclusion Report ("Report"), pursuant to Section 20.18(h) of the Commission's rules and the *Order*, DA 11-1125, released June 28, 2011 ("*Exclusion Report Order*"), from the Public Safety & Homeland Security Bureau ("Bureau").

ATN operates various systems, all of which are handset-based. Attached to this narrative are declarations from James Fredrickson, Vice President Network Engineering for ATN and Leonard Westlake, Vice President Network Engineering for Comment Wireless, LLC¹, and a table listing the counties/PSAPs as to which ATN is reporting that it is not Phase 2-compliant with respect to CDMA and GSM/UMTS operations in that area. As to each of these CDMA and GSM/UMTS operations: (a) the CDMA is a roam and local subscribers system; (b) the UMTS network in the U.S. Virgin Islands is a roam and local subscribers system; (c) the GSM/UMTS system in the continental US is a roam-only, carriers' carrier system serving incoming roamer traffic; and (d) all of these systems operate in remote rural and/or insular areas.

¹ Commnet Wireless, LLC ("Commnet") is a wholly owned subsidiary of ATN. Commnet and its subsidiaries operate solely in the United States.

These CDMA/GSM/UMTS operations are in places where ATN has few cell sites. Even where the table appears to show a larger number of sites, such as Pima County, Arizona, the number of sites must be put into context with the area being served. For example, Pima County, home to the city of Tucson, Arizona, has a total land area of 9,187 square miles, of which the Tucson populated area covers only about 1,500 square miles. (ATN is *not* licensed for and does not cover the city of Tucson or any suburbs thereof.) The rest of Pima County, on the other side of the Sierrita Mountains from Tucson and its suburbs, consists of the Sonoran Desert, the Buenos Aires and Cabeza Prieta National Wildlife Refuges, Organ Pipe Cactus National Monument, and the Tohono O'odham Indian Reservation. This wild, sparsely populated and remote area, larger by far than the state of Connecticut (which has a land area of only 4,485 square miles), presents a challenge to serve at all, as the local PSAP has recognized.

Respectfully submitted,

January 18, 2019

Rini Coran, PC 1140 19th Street NW, Suite 600 Washington, DC 20036 Bv: /s/

David J. Kaufman, Counsel 202-955-5516 dkaufman@rinicoran.com

DECLARATION OF JAMES FREDRICKSON

I, James Fredrickson, declare under penalty of perjury that:

I am the Vice President Network Engineering for ATN International, Inc. and its subsidiaries operating in the U.S. Virgin Islands, (collectively, "ATN"). I am the individual who serves as the chief contact person with oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h) for ATN. I have read the foregoing January 18, 2019 E911 Exclusion Report for ATN, including the table attached thereto. All facts set forth therein are true and correct, to the best of my knowledge, information and belief.

My business address and phone number are: 500 Cummings Center #2450, Beverly, MA 01915, Tel. 978-619-1326.

Executed as of January 18, 2019.

DECLARATION OF LEONARD WESTLAKE

I, Leonard Westlake, declare under penalty of perjury that:

I am the Vice President Network Engineering for Commnet Wireless, LLC and its subsidiaries, (collectively, "Commnet"). I am the individual who serves as the chief contact person with oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h) for Commnet. I have read the foregoing January 18, 2019 E911 Exclusion Report for Commnet, including the table attached thereto. All facts set forth therein are true and correct, to the best of my knowledge, information and belief.

My business address and phone number are: 1562 Park St # E, Castle Rock, CO 80109, Tel. 720-733-7696.

Executed as of January 18, 2019.

Leonard Westlake

Exclusion Report - E911								7,157		
ATM / Commet State	County	Technology Pt	nase Compilant	P1 Complete	P2 Complete	PBAP Name	10 Sites P	n Guas	ملاة اددو	
AZ							e a company	A. S. C. S. C.	B P K i	. Pillian B
AZ	Coconino Coconino		2 NO 2 NO	2/3/09	7/15/09 CDMA	Page Police Dept Kane County Sheriff Office Dispatch	0	9	9	
AZ AZ	Maricopa	CDMA_GSM_UMTS	2 NO	8/6/10		Maricopa County Sheriff Office	ō	7	7	
AZ AZ	Maricopa Pima		2 NO 2 NO	8/6/10 7/28/10		Wickenburg Police Department Pima County Sheriff - Ajo	0	3 13	3 13	
AZ	Pima	CDMA_GSM_UMTS	2 NO	7/28/10	6/17/10 CDMA	Pima County Sheriff - Tucson	ŏ	7	7	Exclude
AZ	Yavapai	CDMA_GSM_UMTS	2 NO	2/8/10	2/10/10	Yavapai County Sheriff Office	0	4	4	
CA	Inyo		2 NO	1/27/11	1/27/11	Inyo County Sheriff	0	1	1	***************************************
CA	Inyo	CDMA_GSM_UMTS	2 NO			California Highway Patrol-Bishop Communications	0	1	1	
co	Alamosa		2 NO		9/7/18	Colorado State Patrol-Alamosa	0	1	1	
co co	Archuleta Chaffee		2 NO 2 NO	7/13/10	7/13/10 CDMA	Archuleta County Combined Dispatch Chaffee County Sheriff	0	3	3	
co	Delta	CDMA	2 NO	,,,,,,,,	man obina	Delta County Sheriff Office	ō	2 3	3	
co co	Dolores Elbert		2 NO 2 NO			Cortez Police Department Douolas Regional 911 Dispatch	0	3	3	
co	Garlield		2 NO			Garfield County Emergency Communications	0	5 3	5 3	
co co	Gunnison Hinsdale		2 NO 2 NO	7/14/10	7/14/10	Gunnison County Communications	0	7	7	Exclude
co	Lake		2 NO	7/15/10	7/15/10	Gunnison County Communications Lake County Sheriff	0	2	2	Exclude
co co	LaPlata		2 NO	6/2/08	11/3/09	Durango-La Plata Emergency Communications	ō	2	2	
lco	Las Animas Mineral		2 NO 2 NO			Trinidad Police Department Colorado State Patrol-Alamosa	0	2 3	2	
co	Montezuma	CDMA_GSM_UMTS	2 NO	1/22/09	11/3/08	Cortez Police Department	ŏ	4	4	
co co	Montrose Ouray		2 NO 2 NO	9/22/09	9/22/09	Montrose County Sheriff Office Montrose County Sheriff Office	0	3	3 4	Exclude
co	Park	CDMA_GSM_UMTS	2 NO	10/7/08	6/30/05	Park County Communications Center	0	15	15	Exclude
co co	Prowers Pueblo		2 NO 2 NO	10/7/08	6/30/05	Prowers County Communications	0	1	1	
co	Rio Blanco		2 NO	9/24/09	N/A	Pueblo County Sheriff Office Rio Blanco County Sheriffs Office	0	3 5	3 5	
co co	Rio Grande San Miguel		2 NO			Colorado State Patrol-Alamosa	0	1	1	
co	San Miguel		2 NO 2 NO			Western Colorado Regional Dispatch San Miguel County Sheriff Office	0	2	2 1	
co	Teller		2 NO	tensous announcement	### A TEXT COMMON ASSESSMENT ASSE	Teller County Sheriff	ŏ	<u> i</u>	i	
МТ	Sanders	CDMA_GSM_UMTS	2 NO			Sanders County 911	0			
MT MT	Madison	CDMA_UMTS	2 NO		2/23/16	Madison County Sheriff Office	0	i	i	
CARA NAMED AND ASSOCIATION OF STREET	Meagher	CDMA	2 NO		10/22/14	Meagher County Sheriff Office	0	1	1	
ND	Ward	CDMA	2 NO	4/5/11		Minot City-Ward County Central Dispatch	0	1	1	
NM	Catron	CDMA_GSM	2 NO	10/30/09	10/30/09	Catron County Sheriff				11.25
NM	Colfax	CDMA_GSM_UMTS	2 NO	9/25/09	9/25/09	Raton Police Department	0 0	3 8	3 8	Exclude
NM NM NM	Colfax Grant	CDMA_GSM_UMTS GSM	2 NO 2 NO	9/25/09 6/2/09		Raton Police Department Grant County Regional Dispatch	0 0	8 2	8 2	Exclude
NM NM NM	Colfax Grant Hildago Lincoln	CDMA_GSM_UMTS GSM GSM_UMTS CDMA_UMTS	2 NO 2 NO 2 NO 2 NO	9/25/09 6/2/09 9/24/09	9/25/09	Raton Police Department Grant County Regional Dispatch Hidalgo County Sheriff Ruidoso Police Department	0	8 2 1 1	8	Exclude
NM NM NM NM	Colfax Grant Hildago Lincoln Los Alamos	CDMA_GSM_UMTS GSM GSM_UMTS CDMA_UMTS CDMA_UMTS	2 NO 2 NO 2 NO 2 NO 2 NO 2 NO	9/25/09 6/2/09 9/24/09 4/25/08	9/25/09 6/25/09	Raton Police Department Grant County Regional Dispatch Hidalgo County Sheriff Ruidoso Police Department Los Alamos County Police Dept	0 0 0	8 2 1 1	8 2 1 1 4	
NM NM NM NM NM	Colfax Grant Hildago Lincoln Los Alamos Mora Otero	CDMA_GSM_UMTS GSM GSM_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_GSM_UMTS CDMA_GSM_UMTS	2 NO 2 NO 2 NO 2 NO 2 NO 2 NO 2 NO 2 NO	9/25/09 6/2/09 9/24/09	9/25/09	Raton Police Department Grant County Regional Dispatch Hidalgo County Sheriff Ruidoso Police Department Los Alarmos County Police Dept Dept of Public Safety Dist 2-Las Vegas Otero County Sheriff	0 0 0	8 2 1 1	8 2 1 1	Exclude
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NM NM NM NM NM NM NM NM NM	Colfax Grant Hildago Lincoln Los Alamos Mora Otero Otero Otero Rio Arriba San Juan	CDMA_GSM_UMTS GSM GSM_UMTS CDMA_UMTS CDMA_GSM_UMTS CDMA_GSM_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_GSM_UMTS CDMA_GSM_UMTS	2 NO	9/25/09 6/2/09 9/24/09 4/25/08 12/14/10 11/18/08 4/25/08	9/25/09 6/25/09 6/9/11 10/28/09 9/25/09	Raton Police Department Grant County Regional Dispatch Hidalgo County Sheriff Ruidoso Police Department Los Alamos County Police Dept Dept of Public Safety Dist 2-Las Vegas Otero County Sheriff Lincoln County Sheriff Espanola-Rio Arriba 911 San Juan County Communications San Juan County Communications	0 0 0 0 0 0 0 0	8 2 1 1 4 12 5 1 16 1	8 2 1 1 4 12 5 1 16 1	Exclude
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NM N	Colfax Grant Hildago Lincoln Los Alamos Mora Otero Otero Otero Rio Arriba Ran Juan Sandoval Santa Fe Taos-Colfax Taos-Red River Churchill Esmeralda Esmeralda Humbott Lander Lyon Mineral	CDMA_GSM_UMTS GSM_UMTS CDMA_UMTS CDMA_GSM_UMTS	2 NO	9/25/09 6/2/09 9/2/4/09 9/2/4/09 4/25/08 12/14/10 11/18/08 4/25/08 11/12/08 10/20/09 10/16/09 2/3/11	9/25/09 6/25/09 6/9/11 10/28/09 9/25/09 10/29/09 10/16/09 9/22/09 2/3/11	Raton Police Department Grant County Regional Dispatch Hidalgo County Sheriff Ruidoso Police Department Los Alamos County Police Dept Dept of Public Safety Dist 2-Las Vegas Otero County Sheriff Lincoln County Sheriff Department Espanola-Rio Arriba 911 San Juan County Communications San Juan County Communications Sandoval County Communications Sandoval County Communications Sandoval County Communications Taos Central Ce	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	8 2 1 1 4 12 5 5 1 10 9 9 3 5 23 23 24 4 1 1 16 1 1 1 1 1 1 1	8 2 1 1 4 12 5 1 16 1 5 2 3 2 3 2 3 2 4 1 1 1 1 6 1 1 1 1	Exclude
NM N	Colfax Grant Hildago Lincoln Los Alamos Mora Otero Otero Otero Rio Arriba Ran Juan Sandoval Sandoval Sandoval Sanda Fe Taos-Coffax Taos-Red River Churchill Esmeralda Esmeralda Esmeralda Lander Lyon Mineral Nye Nye	CDMA_GSM_UMTS GSM_GSM_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_GSM_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_GSM_UMTS	2 NO	925/09 6/2/09 9/2/4/09 9/2/4/09 4/25/08 12/14/10 11/18/08 4/25/08 11/2/08 11/2/08 11/2/08 11/2/09 10/16/09 6/15/09 2/3/11	9/25/09 6/25/09 6/9/11 10/28/09 9/25/09 10/29/09 10/15/09 10/16/09 9/22/09 2/3/11	Raton Police Department Grant County Regional Dispatch Hidalgo County Sheriff Ruidoso Police Department Los Alamos County Police Dept Dept of Public Safety Dist 2-Las Vegas Otero County Sheriff Lincoln County Sheriff Department Espanola-Rio Arriba 911 San Juan County Communications San Juan County Communications Sandoval County Communications Sandoval County Communications Santonal County Communications Taos Central Communications Taos Central Communications Taos Central Communications Research Nye County Sheriff Fonopah Nye County Sheriff Pahrump Humboldt County Sheriff Nye County Sheriff-Tonopah Nye County Sheriff-Tonopah Nye County Sheriff-Tonopah	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	8 2 1 1 4 4 1 1 1 1 6 1 1 1	8 2 1 1 4 12 5 1 10 9 3 5 23 23 24 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Exclude
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NM N	Colfax Grant Hildago Lincoln Los Alamos Mora Otero Otero Otero Rio Arriba Ran Juan Sandoval Santa Fe Taos-Colfax Taos-Colfax Taos-Red River Churchill Esmeralda Esmeralda Humbott Lander Lyon Mineral Nye Nye Nye Pershing Washoe Malheur Brewster Beaver Box Elder Garfield Kane	CDMA_GSM_UMTS GSM GSM_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_GSM_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_UMTS CDMA_GSM_UMTS CDMA_UMTS CDMA_GSM_UMTS	2 NO	9/25/09 6/2/09 9/24/09 4/25/08 12/14/10 11/18/08 4/25/08 11/12/08 10/20/09 10/16/09 6/15/09 2/3/11 N/A 2/3/11	9/25/09 6/25/09 6/9/11 10/28/09 9/25/09 10/29/09 10/15/09 10/16/09 9/22/09 2/3/11 N/A 2/3/11 2/17/11	Raton Police Department Grant County Regional Dispatch Hidalgo County Sheriff Ruidoso Police Department Los Alamos County Police Dept Dept of Public Safety Dist 2-Las Vegas Otero County Sheriff Lincoln County Sheriff Department Espanola-Rio Arriba 911 San Juan County Communications San Juan County Communications San Juan County Communications Sandoval County Communications Sandoval County Communications Taos Central Communications Taos Central Communications Taos Central Communications Rose County Sheriff Nye County Sheriff-Inonpah Nye County Sheriff-Pahrump Humboldt County Sheriff Nye County Sheriff-Inonpah Nye County Sheriff Sheriff Reno Public Safety Dispatch Malheur County Sheriff Brewster County Sheriff Brewster County Sheriff Brewster County Sheriff		8 2 1 1 4 4 12 5 1 16 1 1 0 9 3 3 5 23 14 4 4 1 1 1 1 6 1 1 1 3 3 4 5 7 4 4 1 1 1 1 1 3 3 4 5 7 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	8 2 1 1 4 4 12 5 1 6 1 1 1 1 6 1 1 1 1 6 7 4 4 5 7 4 1 1 1 5 5 1 1 1 3 3 1 1 1 1 1 1 1 1 1 1	Exclude
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NM N	Colfax Grant Hildago Lincoln Los Alamos Mora Otero Otero Rio Arriba San Juan Sandoval Sanda Fe Taos-Colfax Taos-Colfax Taos-Red River Churchill Esmeralda Esmeralda Esmeralda Esmeralda Lander Lyon Mineral Nye Nye Nye Pershing Washoe Malheur Brewster Box Elder Gardield Kane Kane San Juan	CDMA_GSM_UMTS GSM GSM_UMTS CDMA_UMTS CDMA_GSM_UMTS CDMA_GSM_GMA_GMA_GMA_GMA_GMA_GMA_GMA_GMA_GMA_GM	2 NO	9/25/09 6/2/09 9/24/09 9/24/09 4/25/08 12/14/10 11/18/08 4/25/08 11/12/08 10/20/09 10/16/09 2/3/11 N/A 2/3/11 7/12/10	9/25/09 6/25/09 6/9/11 10/28/09 9/25/09 10/29/09 10/15/09 10/16/09 9/22/09 2/3/11 N/A 2/3/11 2/17/11	Raton Police Department Grant County Regional Dispatch Hidalgo County Sheriff Ruidoso Police Department Los Alamos County Police Dept Dept of Public Safety Dist 2-Las Vegas Otero County Sheriff Lincoln County Sheriff Department Espanola-Rio Arriba 911 San Juan County Communications San Juan County Communications Sandoval County Communications Sandoval County Communications Sandoval County Communications Taos Central Communications Taos Central Communications Taos Central Communications/RED RIVER MARSHALL Churchill County Sheriff Nye County Sheriff-Pantrump Humboldt County Sheriff Nye County Sheriff-Pantrump Humboldt County Sheriff Nye County Sheriff-Inonpah Nye County Sheriff Sheriff Reno Public Safety Dispatch Malheur County Sheriff Brewster County Sheriff Breaver County Sheriff Page Police Dept San Juan County Sheriff		8 2 1 1 4 4 12 5 1 16 1 10 9 3 5 5 23 14 4 1 1 1 16 1 1 1 3 4 4 5 7 4 1 1 1 1 3 3 3 1 1 9	8 2 1 1 4 12 5 1 16 1 1 10 9 3 5 23 14 4 4 5 7 4 1 1 5 5 1 1 1 1 3 3 1 1 9 9	Exclude